

July 1, 2014

Employee Benefits Security Administration Room N-5655 U.S. Department of Labor 200 Constitution Avenue, N.W. Washington, DC 20210

Re: Target Date Fund Disclosure - RIN 1210-AB38

Dear Sir or Madam:

We appreciate that the period for public comment on proposed regulatory amendments for target date funds has been reopened. We read many of the comments on this topic that have been submitted to the Department of Labor and they are all well intentioned. However, we work with plan participants daily and find that unsolicited notices to plan participants do not inform or educate. Why?

First, you have to talk to participants about their concerns, not what you think they should be concerned about. Second, if an unsolicited notice is over one page, no one reads it. We could go on, but the first two reasons have already virtually eliminated all your potential readers.

So, what to do? Well, if you get participants in front of you, you certainly greatly increase the odds of their learning something. For example, employers could have annual meetings, one or many throughout the year, where attendance is mandatory to cover all the topics that are now subject to notice requirements.

We recommend that the DOL delay any additional notice requirements and look for more effective ways to inform plan participants.

Respectively yours,

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